

2-SA-ER

May 9, 1975

SPCC Plan Review, C.E. Carpenter & Company, Wharton, New Jersey

Henry Gluckstern
 Water Enforcement Branch
 Enforcement & Regional Counsel Division
 EPA, Region II
 26 Federal Plaza
 New York, New York 10007

As per your request, the attached SPCC Plan was reviewed for adequacy. The following portions of Section 112.7 were not discussed:

112.7(a) - No discussion was made of the oil spill that occurred on January 30, 1975.

112.7(b) - No analysis was made of spill potential.

112.7(e)(4)(iii) - No mention is made of whether the tank truck loading area is equipped with a warning system to avoid a truck leaving with a hose still attached.

These discrepancies are minor. However, it is felt that the facility should remove all buried waste chemical drums and dispose of them in a proper sanitary landfill. Also, the facility should be required to monitor the effluent from their diked areas under their NPDES permit.

Paul R. Elliot
 Chief
 Emergency Response Section

Attachment

346290



SA/ERB:CKPrice:nde:Bldg.209:x548:5/9/75

CONCURRENCES

SYMBOL	SA/ERB	SA/ERB	SA/ERB				
SURNAME	PRICE	ELLIOT	SPEAR				
DATE	<i>CPH</i>	<i>E</i>					